US EPA RECORDS CENTER REGION 5
446464

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BLVD
CHICAGO, IL 60604

16 NOV 2012

MEMORANDUM

DATE:

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the Wedron Ground Water Site (Site ID #C5B8)

FROM: Steven J. Faryan, On-Scene Coordinator
Emergency Response Branch - Section 3

THRU: Samuel Borries, Chief
Emergency Response Branch 2

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to confirm verbal approvals for emergency expenditures and to seek approval of an additional expenditure for mitigation of threats to public health and the environment at the Wedron Ground Water Site in Wedron, LaSalle County, Illinois. On December 15, 2011 the acting Emergency Response Branch 2 Chief, verbally approved a $2,500 emergency expenditure, and on August 30, 2012 the acting Emergency Response Branch 2 Chief gave an additional verbal approval of $2,500, for provision of bottled water to residents at the Site. This Action Memorandum requests and seeks your approval to expend up to an additional $507,480, for a total of $512,480, in order to mitigate the threat to public health, welfare, and the environment from benzene and other volatile organic compounds (VOCs) in drinking water.

The actions proposed herein will mitigate the threats by providing temporary bottled water and by installing a permanent alternate drinking water source for the residents in the benzene and VOC contaminated ground water plume. The Site is located in an unincorporated area in Dayton Township, LaSalle County, Illinois. The LaSalle County Health Department and Illinois Department of Public Health (IDPH) determined that benzene and other VOCs detected in drinking water wells exceeds the legally enforceable drinking water Maximum Contaminant Level (MCL), set forth at 40 CFR § 141.61, and poses a public health hazard to water users. Due to public health threats at the Site, this removal action is considered Time-Critical. The project will require an estimated 90 working days to complete.

There are no nationally significant or precedent-setting issues associated with the Site. The Site is not on the National Priorities List (NPL).

The Action Memorandum would serve as approval for expenditures by EPA, as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILN000510677
State ID: 09982903
Category: Time-Critical Removal

A. Site Description

1. Removal site evaluation

The unincorporated town of Wedron is adjacent to the Fox River, and all of the homes and businesses have private wells as their source of drinking water. A railroad track runs along the border of Wedron, between the town and the Fox River, which is currently owned by Illinois Railway, LLC (Illinois Railway). There are approximately 40 private homes in this unincorporated area, and no municipal water system exists. Residential homes and businesses in Wedron obtain drinking water from private wells that are typically 140-200 feet in depth. EPA has sampled 33 of the private wells. Currently, four homes exceed the MCL for benzene of 5 parts per billion (ppb), and one home has concentrations at 3 ppb for benzene. EPA projects that many of the residential homes that do not have contaminated wells may experience drinking water contamination at a later date based on their proximity to the ground water contamination plume. The closest public water supply is approximately 5 miles away in Ottawa, Illinois. Wedron does not have a local body of government, and is governed by the Dayton Township.

The major industry in town includes the Wedron Silica Company (Wedron Silica), owned by Fairmont Minerals, and Technisand, Inc., also owned by Fairmont Minerals. Both operations reside in town and operate as a silica mining, processing and loading operation, and a sand coating operation, respectively. Wedron Silica regularly pumps and recycles water in its mining pits as part of the sand mining process. In addition, Wedron Silica owns and operates a technical center and laboratory in Wedron.

Wedron has a history of contamination in drinking water, dating back to April of 1982. The Illinois Environmental Protection Agency (IEPA) and IDPH conducted an investigation from 1982-1985 and determined that seven of eight private wells and a well at the former Martin Marietta Corporation (Martin Marietta) facility were contaminated with VOCs and high levels of

benzene. The well at the former Martin Marietta scale house contained the highest level of contamination. IEPA identified several underground storage tanks at facilities near the contaminated wells located at the former Doyle Hoxsey gas station and store (Hoxsey property) and on the former WD Grain Company (WD Grain) property. IEPA installed three monitoring wells in the vicinity of suspected sources in May of 1984. Ground water elevations at the time of the investigation indicated the ground water flow was to the north and toward the residential homes in Wedron. In addition, soil vapors were noted in the sub-surface soil on the former Martin Marietta scale house property, which is now owned by Wedron Silica.

In 1985, the Illinois Commerce Commission installed two deep wells on the former Martin Marietta property near the existing Wedron Silica technical center, and seven residences were hooked up to the wells. IEPA investigated several sources during this time including: the former WD Grain property located on the current railroad right-of-way; the Hoxsey property; and the former Martin Marietta property. IEPA halted ground water monitoring and investigation into the source of contamination once the residences were connected to the deeper wells.

IEPA and IDPH sampled residential wells in Wedron in October of 2011 and found two private wells were contaminated with benzene and other VOCs above the MCLs. IEPA referred the Site to EPA for assistance in a letter dated November 10, 2011 from Bruce Everetts to EPA.

In July and August 2012, IEPA assisted EPA in conducting an investigation into the groundwater contamination. The Agencies conducted this investigation to determine potential sources of the contamination and to define the extent of the ground water contamination plume. EPA is basing the action proposed herein on information from the investigation and on historical information provided by the IEPA. The properties with contaminated wells will be provided with a whole house treatment unit or an alternate source of drinking water to prevent further exposure to benzene and other VOCs.

2. Physical location

The Site is located in Dayton Township, in LaSalle County, Illinois. The coordinates for the Site are Latitude: 41° 26' 13.303" and Longitude:-88° 46' 28.156". The unincorporated town contains approximately 40 residences, including children and elderly residents. The surrounding land use is mostly agricultural to the north of Wedron and sand mining to the west, east, and south of Wedron. The Fox River forms the eastern most border of Wedron. A railroad track runs along the border of Wedron, between the town and the Fox River.

The area surrounding the Wedron Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Site is in a census tract with a score of 6 and 7. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern. Please refer to the attached EJ analysis for additional information (Attachment 5).

3. Site characteristics

The Site is mixed residential, commercial and industrial, with contaminated wells on residential properties and potential sources of contamination on industrial or commercial properties.

Wedron Silica operates numerous sand mining pits where silica is mined, processed, and loaded for shipment by rail and truck. The operation uses several mining pits, which are pumped for water to use in the mining process. These reservoir mining pits are pumped throughout the year, and historically were pumped to extremely low levels. The historical pumping caused residential wells to become dry, and Wedron Silica provided water to residents for some years, as a result. EPA is investigating whether current pumping and recycling water in the mining pits influences groundwater flow at the Site.

Several historical spills have occurred along the railroad tracks in Wedron, most recently in June 2012 when Illinois Railway released 600-800 gallons of diesel fuel. An alleged derailment resulting in a major release of pure benzene along the track occurred in the late 1960s or early 1970s. Two underground storage tank locations were identified on Illinois Railway property. Illinois Railway conducted a limited voluntary investigation in August 2012 to partially characterize potential releases from those locations.

A gas station and convenience store were located on the Hoxsey property, which ceased operation in 1977 after an all consuming fire, according to information provided by Ms. Godman. Ms. Godman is a Trustee of the property after owner Doyle Hoxsey's death, the Inette M. Godman Trust, and a member of the current property owner, Wedron Lots 1-2, Block 9, LLC. A 2012 IEPA investigation in the right-of-way adjacent to the Hoxsey property found VOC contamination in soils. As a result, on July 26, 2012, counsel representing Ms. Godman, the Inette M. Godman Trust, and Wedron Lots 1-2, Block 9, LLC reported a hazardous material leak or spill incident from underground tanks at the Hoxsey property to the Illinois Emergency Management Agency. The owner of the property conducted test excavation pits to determine whether underground storage tanks were present on the property. The investigation and test pits were conducted on November 5, 2012 and the observations were that no underground tanks were present on the property.

Past owners and operators of businesses in Wedron may have used, stored, transported, and/or released benzene and/or other VOCs during historical business operations, including farm supply business operations, laboratory operations, former sand mining operations, and railroad transport.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

In October 2011, IDPH collected samples at the Site from ten residential wells. Two of the residences showed levels of benzene and other VOCs exceeding the MCL. Since December 2011, EPA has sampled 30 residential wells and determined that 5 of the wells have levels of benzene near or above the MCL of 5 ppb. Additionally, EPA will conduct vapor intrusion sampling to assess potential vapor intrusion inside the homes and under concrete slabs.

TABLE 1- Residential Well Water Sample Results

Sample Location	Date	Sampled By	Benzene (ug/L)	Benzene MCL (ug/L)
WGC RW01 121411	12/14/11	Faryan/ Senna	9.2 ug/L	5
WGC RW02 121411	12/14/11	Faryan/ Senna	2200 ug/L	5
WGC RW01 013012	01/30/2012	Senna	140 ug/L	5
WGC RW02 041212	04/12/2012	Faryan/ Senna	3.5 ug/L	5
WGC RW01 053112	05/31/12	Faryan/ Columb	2400 ug/L	5

EPA continues to investigate and identify potential sources of contamination. The groundwater contamination plume has the potential to migrate and contaminate additional residential wells, based on IEPA ground water flow information from the 1980s and due to the potential influence on current ground water wells caused by Wedron Silica mining operations. As a contingency, EPA estimates that an additional 5 residential homes that do not have contaminated wells may experience drinking water contamination during the removal action based on their proximity to the ground water contamination plume. This action memorandum covers the cost of additional ground water sampling and the potential for providing alternative water supply to a total of 10 residential homes.

5. NPL status

The Site is not on the NPL and will not be proposed for the NPL or receive a Hazard Ranking System rating.

6. Maps, pictures and other graphic representations

The map in Attachment 4 identifies the homes that have been sampled.

B. Other Actions to Date

1. Previous actions

IEPA and IDPH became aware of ground water contamination at the Site in 1982. At that time, the Agencies identified seven residences with private wells contaminated with benzene and other VOCs. IEPA conducted a ground water investigation in 1984 and installed three monitoring wells. For a final remedy, IEPA drilled two deeper wells to provide clean water to all the residents with contaminated wells. The Illinois Commerce Commission obtained funding in 1985 to install these deep wells, which continue to provide water for the seven residents that were affected by the contamination in the 1980s. None of the residents using the deep wells installed in 1985 are experiencing current drinking water contamination.

In October 2011, IDPH collected samples at the Site from ten residential wells. Two of the residences showed levels of benzene and other VOCs exceeding the MCL. IEPA subsequently referred the Site to EPA for assistance.

2. Current actions

Starting on December 16, 2011, EPA made arrangements to supply commercial water dispensers to two homes with well water that exceeded the MCL for benzene. EPA supplied two additional homes with bottled water in March 2012 and May 2012 when benzene was detected in wells above or near the MCL. The map in Attachment 4 identifies the homes that have been sampled. EPA has sampled a total of 33 residential wells, including the deep wells installed in 1985, and determined that 4 homes have levels of benzene above the MCL of 5 ppb and one home has a concentration of 3 ppb for benzene. Residences that are in close proximity to the plume may need to be provided whole house treatment units or an alternate water supply if conditions change and the wells become impacted. This action memorandum contains a contingency to provide treatment units or an alternative water supply for up to 5 additional residences if it is determined during the removal action that their wells have been impacted.

EPA plans to conduct a vapor intrusion assessment at up to 12 homes in accordance with EPA Region 5 Vapor Intrusion Guide Book. This action memorandum considers the cost of conducting vapor intrusion assessments to determine if there is a vapor intrusion problem. If a documented vapor intrusion problem exits and conditions present a health threat to the residents, then EPA may install remediation systems to remove the vapors from beneath the concrete slabs or basements.

C. State and Local Authorities' Roles

1. State and local actions to date

The LaSalle County Health Department and IDPH worked together to collect samples from private wells in Wedron during October 2011, in response to residents' complaints of odor in their drinking water. IDPH collected drinking water samples for VOCs analysis.

The State and County health departments' primary role is to insure that people who have private wells are aware of the risks associated with using the groundwater.

IEPA assisted in the ground water contamination investigation in July and August of 2012. IEPA used their geoprobe unit to collect ground water and soil samples, which were used to prepare the September 21, 2012 Final Letter Report for the Site. IEPA continues to assist the investigation to identify sources of contamination and to supplement existing ground water flow information. EPA notified IEPA's Underground Storage Tank Section of a buried underground storage tank that may exist at the Hoxsey property.

2. Potential for continued State/local response

IEPA continues to assist with the Site investigation to identify sources of contamination and to supplement existing ground water flow information. Additionally, IEPA is evaluating whether the State Underground Storage Tank Trust Fund can be accessed to address cleanup of the Hoxsey property if investigation confirms a buried leaking underground storage tank at the property.

Given the exigency of the situation, neither the State nor Local governments have the funds to conduct a time-critical removal action in a timely manner to provide an alternate source of drinking water to residents with contaminated wells.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Wedron Ground Water Site present an imminent and substantial threat to public health, or welfare, and the environment, and meet the criteria for a time-critical removal action provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

a. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

EPA sample results show 5 drinking water wells are contaminated with benzene and other VOCs within a plume of contaminated groundwater. Residents using the contaminated wells, including children, are exposed to hazardous substances by drinking well water and using the well water for cooking. There is the potential for additional exposure from inhaling vapors during showering

and washing dishes, or from vapor intrusion through the basements of homes located in the groundwater contamination plume. The highest level of benzene detected by EPA is 2,400 ppb. The Removal Action Level and MCL for benzene is 5 ppb. MCL exceedance and Removal Action Levels are criteria that EPA considers when it evaluates taking an emergency removal action.

Benzene is a Class A human carcinogen. Exposure to benzene at the levels found in the private wells at the Site above the MCL over long periods of time may lead to disorders of the blood and bone marrow system, such as anemia, and may increase the lifetime risk of cancer. Benzene in drinking water poses a potential exposure threat to humans via ingesting contaminated water, as well as the potential of inhaling vapors during showering and washing dishes.

b. Actual or potential contamination of drinking water supplies or sensitive ecosystems.

In October 2011, IDPH and IEPA documented two drinking water wells contaminated with levels of benzene and other VOCs in excess of the MCLs. Subsequent sampling by EPA confirmed the original two residential wells are contaminated and three additional wells were documented to be above or near the MCL for benzene. Since the first samples were collected, detections above safe drinking water standards have become more frequent and appear to be increasing.

c. The availability of other appropriate federal or state response mechanisms to respond to the release.

No other federal or state response mechanism is available to respond in a timely manner to provide an alternate source of drinking water to residents with contaminated wells, given the exigencies of the situation.

The actions proposed herein do not address clean up of potential sources of contamination. EPA is considering the use of CERCLA and other federal or state response mechanisms to further identify and remediate sources of the groundwater contamination.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances at this Site, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

1) Continue to provide bottled water to residents with contaminated wells until an alternative water source is implemented;

2) Evaluate options for implementing an alternative water supply, including:

   a. Option 1 is to install whole house treatment units at each home with contaminated well water. The treatment units will utilize a combination carbon treatment unit and air stripper unit that will remove VOCs. The property owner will be responsible for maintenance of the units;

   b. Option 2 is to drill a shared deep well that will be double cased to prevent any downward migration of the hazardous substances. Implementing a new deep well will require EPA to help negotiate legal agreements among the residents before EPA can tie multiple homes with contaminated wells into one shared deep well; and

   c. Option 3 is to tie the homes with contaminated wells into a deep well that currently exists in Wedron at Wilbur Thompson Park. Fairmount Minerals owns the well and leases the property to the Dayton Township to use and operate.

3) Provide whole house treatment units or an alternative water supply to residences with contaminated wells using one of the three options, or a combination of options, evaluated above;

4) Close the wells that are contaminated in the event EPA connects the homes to a deep well (if a whole house treatment unit is installed at a home with a contaminated well, the well will not be closed);

5) Restore residential property after construction work is completed;

6) Conduct vapor intrusion assessments, as necessary, at up to 12 homes in accordance with the EPA Region 5 Vapor Intrusion Guide Book.

7) Perform vapor intrusion mitigation at properties where relevant indoor air action levels are exceeded in accordance with current EPA guidance. The OSC will request a consultation

from ATSDR for site-specific vapor intrusion action levels. This task may include installation of vapor mitigation systems and post-installation proficiency sampling in accordance with the most current Region 5 and national vapor intrusion guidance; and

8) Conduct a ground water investigation to provide additional information on ground water flow at the Site and determine depths of the contaminants.

The removal actions will be conducted in a manner not inconsistent with the NCP. The OSC will initiate planning for provision of post-removal Site control consistent with the provisions of NCP § 300.415(l). The threats posed by uncontrolled substances considered hazardous meet the criteria listed in NCP § 300.415(b)(2), and the response actions proposed herein are consistent with any long-term remedial actions which may be required.

EPA will not be able to select an Option for implementing an alternate supply of water until EPA determines whether Fairmount Minerals will allow connecting homes with contaminated wells to the Wilbur Thompson Park well (described in Option 3).

Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances. An e-mail was sent to Bruce Everetts of the IEPA on November 13, 2012, requesting that IEPA identify any State ARARs that may apply.

5. Project Schedule

The removal activities described in this memorandum will require an estimated 90 on-site working days to complete.

B. Estimated Costs

Independent government cost estimates for Options 1 and 2 are provided in Attachment 3. The detailed cleanup contractor costs for Option 1, whole house treatment unites (most expensive option), are presented in Attachment 1, and are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs:	
Regional Removal Allowance Costs:	$ 357,480
Total Cleanup Contractor Costs (Install up to 10 whole house filters includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 20% contingency)	
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	$ 65,000
Total Decontamination, Analytical & Tech. Services (DATS)	$ 0
Total CLP	$ 0
Subtotal	$ 65,000
Subtotal Extramural Costs	$422,480
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded up to nearest thousand)	$ 85,000
TOTAL REMOVAL ACTION PROJECT CEILING	**$507,480**

The response actions described in this memorandum directly address the actual or threatened release at the Site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV above, actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may increase public health risks through prolonged exposure to ground water contamination.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $879,481.[1]

($507,480 + $36,720) + (61.61% x $544,200) = $879,481

IX. RECOMMENDATION

This decision document represents the selected removal action for the Wedron Ground Water Site, Wedron, LaSalle County, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site (Attachment 2). Conditions at the Site meet the criteria of the NCP (40 C.F.R. § 300.415(b)(2)) for a removal, and I recommend your approval of the removal action proposed in this Action Memorandum.

The total removal action project ceiling, if approved, will be $512,480. Of this, an estimated $447,480 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 11/16/12
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION OF

REMOVAL ACTION

ENFORCEMENT ADDENDUM HAS BEEN REDACTED

SIX PAGES

ENFORCEMENT SENSITVE

NOT APPLICABLE TO DISCOVERY

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT ONE HAS BEEN REDACTED

ONE PAGE

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
WEDRON GROUNDWATER SITE
WEDRON, LASALLE COUNTY, ILLINOIS

ORIGINAL
OCTOBER 2012

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	1982-85			Illinois EPA Background Files re: Wedron Groundwater Site (NOT COPIED FOR PHYSICAL INCLUSION INTO THE ADMINISTRATIVE RECORD)	57
2	11/10/11	Everetts, B., Illinois EPA	Ribordy, M., U.S. EPA	Letter re: IEPA Request for U.S. EPA Assistance at the Wedron Groundwater Site	3
3	11/29/11	Pressley, J., Illinois Dept. of Public Health	Residents	Letters re: Results of October 19, 2011 Ground Water Sampling	2
4	09/21/12	Patel, O., Weston Solutions, Inc.	Faryan, S., U.S. EPA	Final Letter Report for the Wedron Groundwater Site	260
5	00/00/00	Faryan, S., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Approval and Funding for a Time-Critical Removal Action at the Wedron Ground Water Site **(PENDING)**	13

ATTACHMENT THREE OPTION ONE

HAS BEEN REDACTED

ONE PAGE

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT THREE OPTION TWO

HAS BEEN REDACTED

TWO PAGES

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT 4

SITE LOCATION MAP
Wedron Ground Water Site

ATTACHMENT 5

EJ Map
Wedron Ground Water Site